## **BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI**

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In the Matter of Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri's Revision to its General Exchange Tariff, PSC Mo-No. 35 Regarding Provision of 811 Service.

Case No. IT-2007-0187 Tariff Tracking No. JI-2007-0260

## **AT&T MISSOURI'S MOTION FOR PROTECTIVE ORDER**

AT&T Missouri,<sup>1</sup> respectfully requests that the Commission enter its standard protective order in this case, pursuant to Commission Rule 2.085(1) (4 CSR 240-2.085(1)).<sup>2</sup> In support thereof, AT&T Missouri states as follows:

1. This case is scheduled to be heard by the Commission on Thursday, December

21, 2006, commencing at 8:30 a.m. Post-hearing briefing will follow, though the date by which such briefs will be due has not yet been established.

2. AT&T Missouri anticipates that it will offer direct testimony and/or offer

documents into evidence which contain certain AT&T Missouri (and/or AT&T Missouri affiliate) confidential information involving, but not limited to, the number and locations of network switches that would support the provisioning of 811 service. AT&T Missouri may also refer to such information in its post-hearing brief.<sup>3</sup> This information is regarded as confidential by AT&T Missouri and its affiliates, and its disclosure could provide competitors with information that would be advantageous to them in the highly competitive telecommunications

<sup>&</sup>lt;sup>1</sup> Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri ("AT&T Missouri").

<sup>&</sup>lt;sup>2</sup> In its September 21, 2006 Final Order of Rulemaking in Case No. AX-2003-0404, the Commission adopted a new Confidential Information rule (4 CSR-2.135) that would allow a party to designate confidential information without the need for an order of the Commission. However, the rule is not yet effective. It will become effective thirty days after December 1, 2006, the date on which the Final Order of Rulemaking was published in the Missouri Register. See, 31 Mo. Reg. 2003.

<sup>&</sup>lt;sup>3</sup> The Commission has not as yet established the date by which post-hearing briefs must be filed. Thus, the Commission's new Confidential Information rule may or may not then be effective. See, note 2, supra.

marketplace. To the best of AT&T Missouri's knowledge, none of the information which would be designated as confidential can be found in any format in any public document.

3. Consequently, AT&T Missouri respectfully requests that the Commission enter its standard protective order in this case.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.

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## **CERTIFICATE OF SERVICE**

Copies of this document were served on the following parties by e-mail on December 14, 2006.

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